

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

UNITED STATES OF AMERICA

VERSUS

GEORGE M. FLUITT III (01)

CR CASE NO. 3:20-CR-00196-01

JUDGE DOUGHTY

MAG. JUDGE KAYLA D. MCCLUSKY

**AFFIDAVIT OF RYAN J. MEYER IN SUPPORT OF DEFENDANT GEORGE M.
FLUITT, III'S MOTION TO COMPEL PRODUCTION OF THIRD-PARTY KHALID
SATARY'S POTENTIALLY PRIVILEGED MATERIAL**

I, Ryan J. Meyer, first being duly sworn, state as follows:

1. I am counsel of record for Defendant, George M. Fluitt in the above-referenced cause. I am over 18 years of age and of sound and disposing memory. I have personal knowledge of the facts stated in this Affidavit, and am competent to testify regarding the facts herein.
2. Attached hereto as Exhibit 1 is a true and correct copy of Third-Party Khalid Satary's purported Privilege Log ("Satary Privilege Log").
3. Attached hereto as Exhibit 2 is a true and correct copy of Defendant Fluitt's Objections to the Satary Privilege Log ("Defendant's Objections").
4. Attached hereto as Exhibit 3 is an email dated 2.19.21 which transmitted Defendant's Objections to counsel for Khalid Satary and requested a meet and confer regarding same.
5. Attached hereto as Exhibit 4 is an email dated 2.2.21 from the Filter Team requesting conference with counsel regarding the Satary Privilege Log.
6. Attached hereto as Exhibit 5 is an email dated 5.25.21 from counsel for Defendant Fluitt requesting conference for the second time with counsel for Khalid Satary regarding the Satary

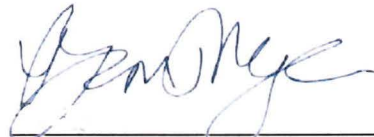
Privilege Log, wherein counsel for Defendant provides counsel for Satary a final date should they refuse to conference.

7. Attached hereto as Exhibit 6 is an email dated 5.25.21 from counsel with the Filter Team wherein they responded in agreement willing to confer as required by the protocol regarding the Satary Privilege Log.

8. Attached hereto as Exhibit 7 is a true and correct copy of the Filter Team's Objections to the Satary Privilege Log.

9. Attached hereto as Exhibit 8 is an email dated 2.11.21 from counsel for Fluitt which requested further information relating to certain parties listed in Satary's privilege log in further attempt to assess the privilege assertions.

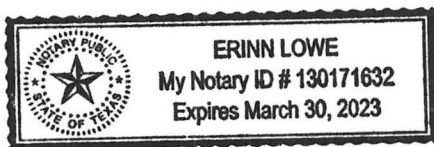
FURTHER AFFIANT SAYETH NOT.



RYAN J. MEYER, Affiant
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2121 N. Pearl Street, Suite 1100
Dallas, Texas 75201
214-765-3600

Subscribed and sworn to BEFORE ME, the undersigned Notary Public by RYAN J. MEYER, the Affiant herein on this 9th day of July, 2021.

[notary seal]



Notary Public, State of Texas

My Commission Expires march 30, 2023